



February 14, 2014

Ms. Michelle Farley
Air Engineer
Department of Natural Resources
2984 Shawano Avenue
Green Bay, Wisconsin 54313-6727

RE: 2nd Half 2013 Title V Permit Summary Monitoring Report
Reporting Period: July 1- December 31, 2013

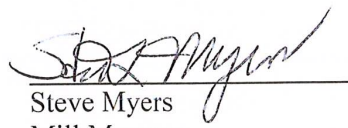
Dear Michelle:

This report is a summary of the compliance status of the monitoring requirements in the Title V Operation Permit 445031180-P12 for the reporting period July 1-December 31, 2013. The permit page numbers and permit references refer to the current permit in effect. Any deviations from permit conditions or excess emissions during this reporting period are summarized in **Appendix A** attached.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,


Thomas G. Jayne
Manager, Environmental Services


Steve Myers
Mill Manager

2nd Half 2013 Title V Permit Summary Monitoring Report

Expera Specialty- Thilmany Mill

Permit No. 445031180-P12
Reporting Period: July 1, 2013 - December 31, 2013

Permit Reference	Compliance (In or Out)	Monitoring Range if applicable
page 9		
A.1.b.(3)	In	monitored in PI scrubber flow ranged from 204-205 GPM; 3 hr block ave scrubber dif P ranged from 2.3- 6.1"W.C.; 3 hr block ave continuously monitored in PI
A.1.c.(4)	In	
page 10		
A.1.b.(6)	In	recorded on Power Boiler Emission Control Checklist
A.1.c.(5)	In	monitored in PI
A.3.a.(2)	In	No. 6 fuel oil ranged from 1.373-1.511 % S
page 11		
A.3.b.(1)	In	SO2 emissions ranged from 0-3 pounds/hr;24 hr ave
page 12		
A.5.c.(1)	NA	No alternative fuels used in the boiler during the reporting period
page 13		
B.1.b.(3)	In	recorded on Power Boiler Emission Control Checklist
B.1.c.(2)	In	recorded on General Utilities Fuel Distribution Report
B.1.c.(4)	In	recorded on Power Boiler Emission Control Checklist
page 14		
B.1.b.(4)	In	monitored continuously in PI
B.1.b.(7)	Intermittent	recorded on Emission Control Checklist; See Appendix A
page 15		
B.1.c.(9)	In	monitored in PI
B.2.c.(2)	In	Submitted 3rd and 4th Q 2013 EE Reports
page 16		
B.3.c.(2)	In	SO2 emissions range from 3.72-4.85 lbs.SO2/MMBTU;24 hour ave and 701- 2133 lbs.SO2/hr, 24 hr ave.
B.3.c.(3)	In	
B.3.a.(3)	In	No. 6 fuel oil ranged from 1.373-1.511 % S
B.3.a.(4)	In	Coal blend sulfur content analyses ranged from 2.44%-3.25%
page 17		
B.5.c.(2)	In	SO2 emissions ranged from 3038-4398 lbs./month;12 mo rolling ave.
B.5.c.(3)	In	
B.5.c.(4)	In	
page 18		
B.6.c.(1)	In	% heat input from TDF ranged from 0- 4.13 %
B.6.c.(2)	In	recorded in TDF Firing files
page 19		
C.1.c.(2)	In	Package Boiler was not on site during 2013
page 20		
D.1.b.(4)	In	Recorded on #19 Air Emission Data Sheet
D.1.c.(2)	In	Recorded on General Utilities Fuel Distribution Report
page 21		
D.1.c.(3)	In	Recorded on #19 Air Emission Data Sheet
D.1.c.(5)	In	on file; no changes made to programs
D.1.c.(6)	In	Recorded on #19 Air Emission Data Sheet
D.1.c.(8)	In	Recorded on #19 Air Emission Data Sheet
page 22		
D.2.c.(2)	In	Submitted 3rd and 4th Q 2013 EE Reports
D.3.b.(2)	In	SO2 emissions ranged from 2.7-106 lbs.SO2/hr; 24 hr ave.
D.3.a.(2)	In	No. 6 fuel oil ranged from 1.373-1.511 % S
page 24		
E.1.c.(2)	In	Recorded on the MACT II CMS summary sheet
page 25		
E.3.c.(1)	In	Recorded on MACT II CMS summary sheet
page 26		
E.4.b.(1)	In	Recorded on MACT II CMS summary sheet
E.4.b.(2)	In	Recorded on MACT II CMS summary sheet
E.4.b.(3)	In	Recorded on MACT II CMS summary sheet
page 27		
F.1.c.(2)	In	Recorded on Lime Kiln Report #22
page 28		
F.3.a.(2)	In	No. 6 fuel oil ranged from 1.373-1.511 % S
F.3.b.(1)	In	SO2 emissions ranged from .51-1.71 lbs.SO2/hr;24 hr ave basis
page 29		
F.4.c.(2)	In	NOx emission rate ranged from 5.79- 8.87 lbs./hr;24 hr ave
page 30		
F.6.b.(1)	Intermittent	see Appendix A
F.6.c.(2)	In	TRS and O2 CEMS reports on file
F.6.c.(3)	In	TRS ppmvd 12 hr block averages ranged from 0-4.26 ppmvd @ 10% O2
F.6.c.(6)	In	3rd and 4th Q 2013 EE reports submitted

Permit Reference	Compliance (In or Out)	Monitoring Range if applicable
page 31		
F.6.c.(6)	In	3rd and 4th Q 2013 EE reports submitted
F.7.b.(2)	In	Recorded on MACT II CMS summary sheet
F.7.b.(3)	In	Recorded on MACT II CMS summary sheet
page 33		
G.1.c.(2)	In	Recorded on Lime Kiln Log Sheet #26
page 34		
H.4.a.(2)(a)	In	Optiquet model printouts and MeOH sample analyses on file
H.4.a.(2)(c)	In	Recorded in Proficy
H.4.c.(2)	In	Monthly checklists on file
page 35		
H.4.b.(6)	In	Recorded in Proficy
H.4.c.(3)	In	Monthly checklists on file
page 36		
H.4.b.(7)	In	MeOH concentration average recalculated and used for the next year current condensate MeOH average concentration is 2933 ppm
H.4.b.(8)	In	All UNOX CMS daily samples were collected, UNOX process parameters recorded in Proficy
page 37		
H.4.b.(9)	In	calculated in Proficy Daily Optiquet model outputs on file
page 38		
H.4.b.(11)	In	submitted with 3rd and 4th Q 2013 EE Reports
page 42		
K.1.c.(2)(b)	In	Paper Machine PM emission rates ranged from .30-.74 lbs./hr; monthly ave basis
page 43		
K.3.a.(3)	In	Paper Machine size press VOC emissions : P11- 203- 676 lbs/mo
K.3.c.(2)	In	P13- 0 lbs./mo P15- 116- 433 lbs./mo
K.3.c.(3)	In	
page 44		
L.1.c.(2)	NA	P52 Extruder was removed.
page 45		
L.2.c.(2)	NA	P33 Wax Coater was shut down and removed in March 2012
L.3.a.(2)	NA	P33 Wax Coater was shut down and removed in March 2012
L.3.c.(1)	In	
page 46		
L.3.c.(2)	In	on file
L.3.c.(3)	In	on file
L.3.c.(4)	N/A	No longer subject to the Paper Coating MACT with the removal of P33 Wax Coater in March 2012
page 47		
M.1.c.(2)	NA	All poly extruders have been shut down and removed.
page 48		
M.3.a.(1)	In	on file
M.3.a.(2)	In	on file
M.3.a.(3)	N/A	P72 Flexo Press shut down and removed
M.3.a.(5)	N/A	P55, P59, and P76 all shut down and removed
M.3.a.(6)	N/A	P55, P59, and P76 all shut down and removed
page 49		
M.4.a.(1)	N/A	All flexo presses have been shutdown and removed.
M.4.c.(2)	N/A	All flexo presses have been shutdown and removed.
page 50		
M.5.a.(1)	N/A	P72 flexo press was shut down and removed.
M.5.c.(2)	In	On file.
page 51		
N.1.c.(1)	In	Logged in Proficy when areas were watered
page 56		
O.5.b.(1)	In	No. 6 fuel oil ranged from 1.373-1.511 % S
O.6.b.(1)	In	facility SO2 emissions ranges from 8134- 8302 tons SO2; 12 mo rolling ave basis
page 61		
O.8.b.(4)	In	records on file
page 63		
O.8.b.(7)	In	3rd and 4th Q 2013 EE reports were submitted
O.8.b.(8)	In	MACT semiannual EE and CMS Performance report submitted
page 64		
O.9.a. and b.	In	PM emission compliance stack test on No. 11 Boiler only was completed on 12/2/09. The average emission rate as .04 lbs PM/MMBTU
page 65		
O.10.b.(1)	In	annual emissions of selected HAPS are reported on the 2013 Air Emission Inventory

Appendix A

Permit Deviation or Excess Emission Summary

Reporting Period: July 1 - December 31, 2013

<u>Permit Reference</u>	<u>Deviation or Excess Emission</u>
Page 14 B.1.b.(7)	The multiclone inspection for 11 Boiler could not be located for: 12/14/13 2 nd shift
Page 30 F.6.b.(1)	As previously reported on the quarterly excess emissions reports, the LVHC NCG collection and incineration system experienced the following vent time for this reporting period: 287.12 minutes including SSM events or 0.11 % of the operating time. There were a total of 62 vents for the 2 nd half of 2013.